

COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA PUBLIC UTILITY COMMISSION P.O. BOX 3265, HARRISBURG, PA 17105-3265

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August 20, 1998

By First Class Mail

EX APPL PURE SIED

Magalie R. Salas, Secretary
Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

FCC MAIL ROOM

RE: CC Docket 98-56; RM-9101

In the Matter of Performance Measurements and Reporting Requirements For Operations Support Systems, Interconnection and Operator Services and Directory Assistance

Dear Ms. Salas:

I am filing these Comments as an *Ex Parte* Presentation on behalf of the Pennsylvania Public Utility Commission (PaPUC) regarding the Notice of Proposed Rulemaking relating to the above-captioned matter.

Pursuant to the regulations of the Federal Communications Commission, I have enclosed two copies of this *Ex Parte* Presentation. Thank you for your assistance in this matter.

Very truly yours,

Stephen E. Gorka, Assistant Counsel PaPUC Law Bureau P.O. Box 3265 Harrisburg, PA 17105-3265

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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

In the Matter Of
Performance Measurements and Reporting
Requirements For Operations Support
Systems, Interconnection, and Operator
Services and Directory Assistance

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EX PARTE PRESENTATION OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

I. INTRODUCTION

The Pennsylvania Public Utility Commission (PaPUC) respectfully submits this written *Ex Parte* Presentation commenting on the Performance Measurements and Reporting Requirements set forth in the FCC's Notice of Proposed Rulemaking at CC 98-56, which was released on April 17, 1998 at FCC Report Number CC 98-10. Pursuant to FCC regulations, two copies of this Presentation have been submitted to the FCC Office of the Secretary.

II. THE PENNSYLVANIA POSITION

The PaPUC is dedicated to insuring that new entrants to the telecommunications market have equal access to Operations Support Systems (OSS).
 Thus, the PaPUC agrees that it is consistent with the public interest for the FCC to adopt

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model OSS performance measurements and reporting guidelines which are non-binding upon the states. The PaPUC can use such standards as a guide when monitoring any discrimination by incumbent local exchange carriers (ILECs) against competitors and

when enforcing state and FCC regulations against parties who do discriminate.

2. The PaPUC supports guidelines and standards which do not preclude states from developing different state guidelines and standards. Additionally, the states should retain the authority to establish penalties for various ILEC violations.

The Pennsylvania Public Utility Commission appreciates this opportunity to present comments on this matter, and will monitor the progress of this FCC docket.

Respectfully submitted,

Stephen E. Gorka, Assistant Counsel Pennsylvania Public Utility Commission

Frank Wilmarth, Deputy Chief Counsel Pennsylvania Public Utility Commission

Bohdan R. Pankiw, Chief Counsel Pennsylvania Public Utility Commission